

ORIGINAL

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EX PARTE OR LATE FILED



March 16, 2000

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RECEIVED

MAR 16 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 95-155

Dear Ms. Salas:

On March 15, 2000, the undersigned and Ellen Oteo of Bell Atlantic, Michael Wade of DSMI, Ben Schneider of Telecordia, Elridge Stafford of US West, and Maryann Wagener of SBC met with Commission staff. Chuck Keller, Diane Harmon, Marty Schwimmer and Les Selzer of the Network Services Division of the Common Carrier Bureau were present in the meeting.

The purpose of the meeting was to respond to incorrect statement made on the record by some Resp Orgs about the operation and performance of the SMS/800 service. The attached written ex parte, filed separately today on behalf of all the RBOCs, includes all of the performance and service quality issues discussed with the staff.

In addition, we also discussed the questions concerning the "first-come, first-served" number reservation system that have recently arisen in connection with the opening of the new toll-free codes. The attached charts were distributed at the meeting. We explained that reservations are made on a first-come, first-served basis from the time the reservation request arrives at the SMS/800 number reservation queue. This is how the system has operated since it began providing service under federal tariff in 1993.

Some have suggested that this arrangement inherently favors RespOrgs that have online and GUI access to the system and disadvantages MGI users. We explained to staff that this is not the case. MGI users can send virtually unlimited numbers of reservation requests through the system, many more than RespOrgs that use the other forms of access. GUI users can request ten numbers at a time and must wait for a response before they can request ten more. Online users may ask if a single number is available and must wait for an affirmative response before launching a separate request to reserve the number.

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Please include a copy of this correspondence in the public record of the above-captioned proceeding.

Sincerely,

Maria Breslin

Attachments

cc: C. Keller
D. Harmon
M. Schwimmer
L. Selzer



Reservation Process

- **On-Line User**

- 2 step process. Must first search and then submit reservation request.
- Can only request a search on 1 number at a time.
- Terminal is locked after each search or reservation request until response is received.
- Manually enters each search or reservation request.

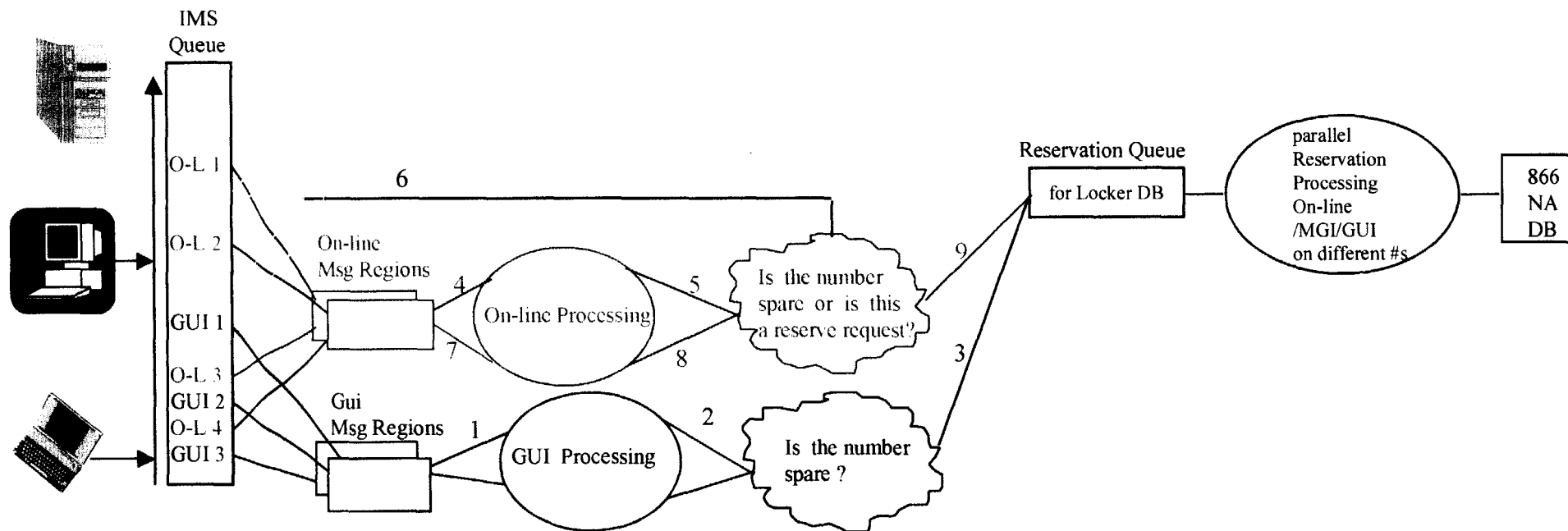
- **MGI User**

- Search & reserved in a single request.
- Can specify search & reserve for 10 numbers in one request.
- Can submit multiple requests without waiting for response.
- Can program requests ahead of time.

- **GUI User**

- Search & reserved in a single request.
- Can specify search & reserve for 10 numbers in one request.
- Must wait for response before submitting next request.
- Manually enters search/reservation information.

Number Reservation Processing



- Every entry into IMS Queue is time stamped when it hits the system
- Entries leave the IMS queue in first-in-first-out manner based on the time stamp and transaction type
- There is parallel processing between the MGI, On-line, & GUI regions and within the regions

MGI/GUI

- 1) One message contains a search and reserve for up to 10 distinct numbers.
- 2) If the number is spare, an entry will be placed into the locker database to hold the number in a pre-reservation status.
- 3) If the number is spare, it will go into the queue for reservation automatically.

On-line

- 4) One message contains a search for up to 10 "related" numbers using wildcards or start criteria.
(Only 1 distinct number can be searched at a time.)
- 5) If the number is spare, a lock will be placed on the number to hold the number in a pre-reservation status.
- 6) A response is sent back to the user indicating whether or not the number is spare.
- 7-9) A reservation request is sent by the user and is placed into the reservation queue.

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Re: CC Docket No. 95-155

Dear Ms. Salas:

In its reply comments in this proceeding,¹ MCI made a number of incorrect statements about the SMS/800 system and its performance. These errors were repeated, and additional inaccuracies added to the record, in an ex parte MCI, AT&T and Sprint (the "Big Three") filed on January 7. The Bell companies respond to both in this letter.²

MCI claims that "SMS/800 performance levels have declined since 1993"³ and "[d]espite the ever-increasing complexity of toll free administration, the BOCs have failed to increase the capacity of the system."⁴ The Big Three make a similar statement — "Unfortunately, the capacity of and enhancements to the SMS/800 have not kept pace with market developments."⁵ Nothing could be further from the truth.

¹ Reply Comments of MCI WorldCom, Inc., NSD Files Nos. L-99-87, L-99-88 (Dec. 16, 1999).

² The Ex Parte also argues that the current mode of operation of the SMS/800 system is inconsistent with section 251(e) of the Act. The Bell companies have rebutted this claim before, most recently in their December 2, 1999, comments and December 16, 1999, reply comments in this docket.

³ MCI at 2.

⁴ MCI at 3.

The comments repeated in both filings also demonstrate a misunderstanding of what's in the SMS/800 system. Both filings say that every time a new area code is introduced, "millions of SMS/800 records must be updated to reflect the new terminating POTS number associated with each affected toll free number." MCI at 2-3; Ex parte at 6. However, fewer than 3 percent of the records in SMS/800 include a terminating POTS number to begin with, and those records would have to be changed *only* in an area code split (as opposed to an overlay) and *only* if the number was one of those being moved to the new area code.

⁵ Ex parte at 6.

The fact is that performance has not declined and that the SMS/800 system has grown and evolved to support the increased demand. As shown in Attachment A, "SMS/800 Improvements," the current mainframe CPU capacity represents an increase of over 700% of the capacity in 1994. And the Bell companies have invested millions in improving and upgrading its hardware and software. These changes have allowed the system to support a growth of RespOrgs from 127 to over 270 today and the growth of toll free numbers from 2 million in 1993 to more than 20 million today. Contrary to the suggestion of the Big Three,⁶ the system is ready to handle the two new toll-free codes that will be put into service in the coming months.

This growth and improvement has kept the system running and running well, to match the growth in the toll-free service business. This is demonstrated by the fact that the response times for transactions have shown no performance degradation over the last three years, despite a ten-fold growth in users and toll free numbers. For example, the transaction response time of the mechanized interface used by the Big Three for number search and reserve processing, has remained reasonably constant throughout the period and, in fact, was at its fastest in the last months of 1999:

MGI Number Search/Reserve Transaction (seconds)⁷

	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug	Sept	Oct.	Nov	Dec.
1997	.26	.28	.32	.30	.33	.30	.26	.45	.33	.26	.23	.40
1998	.32	.24	.41	.26	.16	.14	.15	.14	.16	.14	.16	.13
1999	.14	.23	.26	.24	.23	.22	.22	.25	.23	.24	.13	.09
2000	.15	.07										

This shows that it is simply not true, as the Big Three state, that "it is taking longer to perform the administrative tasks necessary to provide toll free service."⁸

The same is true for customer record validation and update transactions:

CR Validation/Update – Basic Transaction (seconds)

	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug	Sept	Oct.	Nov	Dec.
1997	.48	.47	.45	.43	.46	.48	.48	.68	.65	.55	.46	.46
1998	.40	.44	.42	.36	.38	.39	.43	.40	.41	.36	.39	.36
1999	.38	.50	.58	.47	.44	.40	.43	.41	.40	.46	.26	.21
2000	.13	.19										

⁶ Ex parte at 2.

⁷ This information is collected from the SMS/800 system by the SMS/800 data center on a daily basis using the reports capability of the IBM system. The daily information is summarized monthly using a standard statistical software package.

⁸ Ex parte at 7.

CR Validation/Update – Complex Transaction (seconds)

	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug	Sept	Oct.	Nov	Dec.
1997	.79	.78	.79	.93	1.20	1.01	.84	1.26	1.14	1.13	1.03	1.04
1998	.86	1.60	.88	.59	.79	.74	.75	.78	.75	.63	.68	.65
1999	.66	.81	.86	.73	.68	.74	.84	.90	.70	.72	.43	.29
2000	.17	.29										

The speed of online number search transactions has also remained relatively stable throughout the past three years:

Online Number Search Transaction (seconds)

	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug	Sept	Oct.	Nov	Dec.
1997	.11	.12	.13	.12	.13	.22	.19	.30	.23	.23	.16	.21
1998	.16	.22	.24	.14	.14	.13	.12	.12	.16	.16	.16	.15
1999	.13	.18	.33	.29	.20	.35	.44	.47	.40	.45	.51	.43
2000	.17	.14										

The slower response times during the last half of 1999 were caused by a single RespOrg's misuse of the system.⁹ The Bell companies originally filed tariff changes on December 1 to stop such abuses, and those changes became effective on December 31. The subsequent results indicate that this action was effective.

The Bell companies have also improved the capability of the SMS/800 system to download records to the exchange carrier service control points (SCPs) it supports. In the past four years, the download interface has been upgraded from 9.6 kb links to the SCPs to 56 kb links, an increase of over 580%. In April, we will provide additional capacity through a scaleable TCP/IP interface. This will allow the number of active links to an SCP to grow to meet the increasing demand and will allow downloads at 56 kb and higher. Implementation of this will allow SCP owners to increase capacity of the SCP links by one hundred percent immediately and to continue to increase capacity as demand warrants. Therefore, the statement repeated in both filings that the system "can download a maximum of 200,000 records per day. . . the same capacity as existed four years ago"¹⁰ is plainly false.

The Big Three also make incorrect claims about what they say is inadequate SMS/800 performance.

⁹ A RespOrg was running a computer script that repeatedly and continually searched the database for desirable numbers that might have recently become available for assignment. This activity at times consumed up to seventy percent of system resources. The Big Three recognize that this problem existed and affected system performance. Ex parte at 6.

¹⁰ MCI at 3; Ex parte at 6.

Even the 56kb links allow for the downloading of up to 1 million records a day depending on the complexity of the customer records.

First, MCI says that there has been “an increase in the average time required to activate a toll-free number,”¹¹ and the Big Three echo this claim.¹² But even if this were true, it would not be the fault of the SMS/800 system. The SMS/800 advises a RespOrg that a customer record has become active only after the SMS/800 receives a confirmation from every SCP (as many as 56) that the update has been processed successfully. As long as one SCP has not confirmed the update, the SMS/800 will not advise the RespOrg that the number has been activated. Any slowness perceived by the RespOrg could be caused by various factors, such as an outage in a link between the SMS/800 and an SCP, an SCP being down for maintenance or an extraordinarily large download congesting a link.

Moreover, several carriers installed new SCPs in preparation for the opening of two new toll-free codes in April 2000. This required full loads of data from the SMS/800 system, some of which had to be transmitted over the same links that the SCP owners used for regular updates of their existing SCPs.¹³ This extra congestion in the links was a one-time event and should not be repeated.

RespOrg behavior can also contribute to link congestion. A RespOrg might send large volumes or records to the SMS/800 with instructions that they all be downloaded immediately. The Big Three have refused to agree to load management techniques, such as throttling, or to agree to any limitations on their own conduct, yet they want all SCPs to accept and activate records when the Big Three want them activated.

Second, the Big Three claim that there has been “a dramatic increase in the number of trouble tickets called in to the Help Desk” and point to what they admit are their “anecdotal experiences” with the system and claims about the “trouble tickets” generated by AT&T.¹⁴ In fact, there has been a dramatic *decrease* in the number of trouble calls to the Help Desk — 9801 calls in the fourth quarter of 1997, 7985 calls in that period in 1998 and only 6888 calls last quarter based on statistics generated by the Help Desk. And this decline is all the more noteworthy in light of the increased number of RespOrgs and the growth of the number of toll-free records.

MCI claims that “[d]ecisions that affect the ability of toll free service providers to reserve numbers and update records have been made without adequate consultation with or notification to RespOrgs.”¹⁵ That is simply untrue. The Bell companies provide an update to interested RespOrgs at every meeting of the SMS/800 Number Administration

¹¹ MCI at 3.

¹² Ex parte at 6-7.

¹³ While the SCP owners loaded their new equipment from tapes wherever possible, limitations in the SCPs required that records larger than 32 kb be downloaded.

¹⁴ Ex parte at 6.

¹⁵ MCI at 2.

Committee (SNAC) about the system's performance and scheduled changes in the system. These meeting also give the RespOrgs that are SNAC members (currently about fifteen percent of the SMS/800 customer base) an opportunity to raise issues with the Bell companies and to engage in discussions about this service. This process gives RespOrgs far more information, and far more input, than customers typically get about services they use.

In particular, the Big Three ex parte criticizes the Bell companies' decisions concerning SMS/800 upgrades — that we did not make some changes that they wanted and made others that they did not need.¹⁶ But the Bell companies must manage the SMS/800 system with the needs of *all* users in mind, not just the needs of the Big Three. For example, the Big Three criticize the Bell companies for developing a user-friendly graphical user interface (GUI) for the system¹⁷ that had been requested by smaller providers and that the Help Desk had identified as a means of cutting down on call volumes to the Help Desk. The Big Three, all of which use a mechanized interface to access SMS/800, opposed the development of a GUI because they did not need it and, presumably, because it would reduce their competitive advantage over other RespOrgs. Attachment B deals with each of the specifics raised by the Big Three.

What the Big Three really want is to control SMS/800 service — to enhance it to meet their particular needs without regard for the needs of other RespOrgs or of SCP owners or the cost of those enhancements. It is the Bell companies, however, that provide the service, that are responsible for it and, therefore, that decide how it is to operate. In making these decisions and prioritizing system improvements, they take into account the needs of all users, not just the desires of the Big Three.¹⁸

At the same time as they complain that the Bell companies have too much control over the SMS/800 service, the Big Three also demand that the Bells try to exert control over services that are not their own. Thus, the Big Three criticize the Bell companies because they “to date refused to accept a reasonable degree of responsibility for end-to-end performance of the database system, in particular for the link between the SMS/800 and the LEC's SCPs.”¹⁹ The SMS/800 database system, of course, does not include the SCPs owned by various LECs or the links that those LECs have purchased to receive

¹⁶ Ex parte at 9-12.

¹⁷ Ex parte at 11.

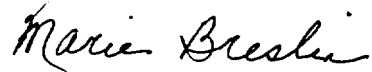
¹⁸ The desire of the Big Three to manage this service is especially galling in light of the fact that, in 1992, the Bell companies offered to transfer this service to a not-for-profit corporation to be managed by the industry, and the Big Three were not interested. See [BOCs'] Response to Comments on Implementation Plan for 800 Data Base Access Service at 14-15, Dkt. 86-10 (May 1, 1992).

¹⁹ Ex parte at 14.

downloads from the SMS/800.²⁰ Moreover, if there is truly a need for standards for “end-to-end performance,” as the Big Three suggest, then those standards would also have to cover the activities of the Big Three as RespOrgs, a feature that is conspicuously absent from the Big Three proposal.

Please include a copy of this correspondence in the public record of the above-captioned proceeding. Please call me if you have any questions concerning this filing.

Sincerely,



Attachments

cc: C. Keller
D. Harmon
M. Schwimmer
L. Selzer

²⁰ This is not unusual in the industry, nor is it surprising. For example, the “SMS” for number portability (the NPAC) is administered separately from the individual exchange carrier number portability databases and the connecting links. There is no “end-to-end accountability” from customer request to record activation for local number portability record processing, which like toll-free administration involves a centralized database. This is not surprising either for 800 or local number portability, of course, because the SMS services are provided by different entities than those that own the local databases.

SMS/800 IMPROVEMENTS

The Bell companies have continuously upgraded and improved their SMS/800 system since they began offering the service in 1993.

In particular, the hardware operating environment has been significantly enhanced to improve system performance. Most recently, the mainframe CPUs were upgraded (approximately 66% increase in CPU MIPS) on November 14, 1999. There have been several other hardware upgrades incorporated into the system since 1993, including upgrades in:

May 1994	Upgrade (133 to 234 MIPS)
November 1996	Upgrade (to 266 MIPS)
August – October 1997	Upgrade (to 390 MIPS)
January 1998	Added second mainframe (to 475 MIPS)
March 1998	Upgrade (to 555 MIPS)
April 1999	Replaced first mainframe (to 575 MIPS)
November 1999	Upgrade (to 955 MIPS)

Charts depicting system capacity and system utilization, both current and historic, are shared with the SNAC on a quarterly basis.

Specific Performance Enhancements:

1. **Terminating Point Master (TPM) Tape Processing:** The TPM tape is processed monthly and adds, deletes or moves NPA-NXXs within LATA tables within the SMS/800. As those changes to the tables are made, the customer record database is scanned to identify records that may be impacted. Information regarding the impacted records is stored for retrieval by Responsible Organizations (RespOrgs). The TPM enhancement included changes to the software for loading and storing the identified customer records in the Reports Input Database (RIDB) in a more efficient manner. The enhancement also reduced the length of time the data remained in the RIDB. (Release 9.1 - 11/08/97)
2. **NPA Split Process I/O Reduction:** The NPA split process utilized secondary indices which resulted in two database lookups (2 I/Os) when accessing a customer record. An enhancement was made to eliminate the need for the second I/O operation, which improved the efficiency of the split process. (Release 9.1 - 11/08/97)
3. **Improved Table Access Routines Used in Customer Record Validation:** The table access routines were re-written to improve the run-time efficiency of the routines and their associated software modules. The improvements benefited mass change routines, such as the NPA Split process, as well as on-line and Mechanized Generic Interface (MGI) users performing customer record administration tasks. (Release 10.0 - 3/21/98)

4. Enhance MGI Protocol to Support TCP/IP: The interface to the MGI companies was enhanced to support flexible network configurations and facilitate link management activities. (Release 10.1 - 12/5/98)

5. RIDB Conversion of Partition 1 to HDAM: Partition 1 of the Reports Input Database (RIDB) was re-designed as a Hierarchical Direct Access Method (HDAM) database. The modification allowed data to be inserted more efficiently by utilizing the first available free space. It also makes deletion more efficient. (Release 11.0 - 7/24/99)

6. 866 / 855 Stress Testing: Testing of the system allowed for fine-tuning changes to enhance performance during code openings. (Release 11.1 - 4/29/00)

7. Scalable TCP/IP for the SCP Interface: This enhancement will update the SMS/800-to-SCP interface from the BX.25 protocol to the modern Transaction Control Protocol / Internet Protocol (TCP/IP). The enhancement will also support scalable links meaning that the SCP interface will no longer be limited to a single 56 Kbps link. (Release 11.1 - 4/29/00)

8. Reports Input Database Performance: With this enhancement, the REPT-SDR data will no longer be stored in Partition 4 of the RIDB but instead will be stored in a new partition. The new partition will be an HDAM database, which will eliminate the need for an index and allow the data to be stored more efficiently by utilizing the first available free space. The keys to the database will also be modified to further improve performance. (Release 11.1 - 4/29/00)

9. Output Load Management: An enhancement has been approved which manages the output message queue during times of SCP link congestion. The modification will allow SMS/800 to SCP messages to be sent based on priority levels, with Mass Change and Resp Org Change messages given the lowest priority and online updates given a higher priority. (Release 12.0 - 11/18/00)

Efficiency Improvements:

1. Maximum Size of RCC Records: The size of Radio Common Carrier (RCC) records have been steadily increasing due to the number of Numbering Plan Area (NPA) splits that have occurred in recent years. A change was required to allow larger RCC records to be downloaded to the SCPs. Lack of action would have resulted in a service disruption for RCC subscribers. (Release 9.1 - 11/08/97)

2. Customer Record Database Redesign to Avoid 8 Gigabyte Limit: The size of the customer record database was nearing the limit imposed by the system operating software. The growth in size was driven by the increasing complexity of customer records because of new NPAs and NPA-NXX routing. The database was re-designed to reduce the storage required for each customer record and to increase the efficiency with which records can be stored and accessed. Lack of action would have resulted in service disruptions for all subscribers with records within the impacted database partition. The database redesign also reduced the frequency and length of time required for database reorganizations. The frequency was reduced from every three to six months, to every six to nine months. The time requirement was reduced from 12 to 15 hours to

approximately six hours. (Release 10.0 - 6/13/98)

3. Sort LAD Entries: An enhancement which was intended to provide a more efficient operating environment for the Resp Orgs, allowing them to more quickly search for multiple data. (Release 10.1 - 12/5/98)

4. Global TN Change: An enhancement was made to allow for the replacement of all terminating numbers (TNs) within a customer record in a single step. This enhancement saved RespOrg time and system resources. (Release 11.0 - 7/24/99)

5. Graphical User Interface (GUI): Implementation of the GUI provided Resp Orgs with a modern, efficient interface which provides for enhanced capabilities (such as the ability to search for up to ten numbers and reserve them in one operation) and higher interface speeds. The previous character-based system was limited to 19.2 Kbps by the required protocol conversion software. The GUI can operate at the speed of the users Web interface, typically 56.0 Kbps. (Release 11.0 - 10/23/99)

6. Removal of Invalid NXXs from Customer Records: A new mass change process which will automate the removal of invalid NPA-NXX combinations from customer records will be implemented. Use of this automated process will reduce the level of manual maintenance required and will improve the efficiency of Resp Org operations. (Release 11.1 - 4/29/00)

7. Electronic File Input to SMS/800 Mass Resp Org Change: This new process will provide a method for Resp Orgs to request a mass Resp Org change on a set of numbers under their control. Use of this input process will improve the efficiency of Resp Org operations. (Release 11.1 - 4/29/00)

8. Delay Removal of NXXs for NPA Split Process: This enhancement will provide Resp Orgs with additional time to correct records requiring manual intervention following the processing of an NPA split. The delay will allow for more efficient Resp Org operations and will reduce the negative impacts of additional NPA splits that occur prior to completion of the manual intervention. (Release 11.1 - 4/29/00)

9. Automatic LAD Labels for NPA Splits and NXX Moves: This feature will add the ability for the NPA split process and the NXX move process to automatically create LAD labels for affected 6#, 10#, and area code CPR nodes and automatically add / delete CPR branches as appropriate. This will improve the efficiency of Resp Org processes. (Release 11.2 - 7/29/00)

10. Delay Removal of NXXs for NXX Moves: This feature will modify the NXX move process to delay the removal of old NPA-NXX combinations until after the 'move end date.' This will provide Resp Orgs with more time to modify manual records and reduce the number of records negatively affected by another mass change, thus causing them to fail validation. (Release 11.2 - 7/29/00)

Attachment B

The Big Three complain that the Bell companies have not followed their suggestions for SMS/800 improvements and that they have undertaken work that the Big Three did not ask for. These are the facts surrounding their specific claims.

Suggestions from the Big Three

1. Provide RespOrg change information only to affected SCPs: The companies that own the SCPs wanted this information. In fact, Sprint was one of the SCP owners that was most adamant about continuing to receive this information.
2. Provide routing change info only to affected SCPs: This is not an inherently bad idea. However, it would be a large undertaking to add this capability to the system and implementing it would put an additional load on system capacity.
3. Future pending record updates: Contrary to the Big Three's suggestion, RespOrgs today have the ability to prioritize updates by scheduling them for any period they choose, including periods of low utilization.
4. Modification of NPA splits and concurrent running of NPA splits: As the accompanying list of SMS/800 system improvements shows, many enhancements to the NPA split process have been made.
5. Report processing modification: We are in the process of defining the requirements for the Reports and History Database (RHDB) and are actively working those requirements with the SNAC.
6. Reengineering of SMS/800: We have conducted a strategic analysis of the system and its future capabilities. The analysis was completed by a team of representatives from all of the vendor organizations, working with The META Group, an outside expert in hardware and technology issues. The results of that study were shared with the technical team of the SNAC last July. The current system architecture is more than sufficient to handle all of the 8XX codes.
7. Increase link capacity: We did investigate higher link speeds and found that the next step up (128 Kbps) was not economically feasible, and provided only minimal improvement. That was one of the factors that led to the decision to move forward with the TCP/IP interface. This should eliminate any problem of link congestion.
8. Global LAD/CPR: This is actively being worked, most recently at a meeting on January 12. Another session is scheduled for March 21.

Improvements the Big Three Did Not Want

1. GUI: A GUI has probably been the most requested enhancement in the history of the SMS/800. Virtually every new RespOrg requests a "more modern" interface. The user surveys continually cite the need for a GUI. In fact, during the RFD process for the SMS/800 Help Desk, potential help desk vendors told us that the best way to reduce help desk costs was to reduce the number of call to the help desk by changing the user interface to a GUI.
2. Guam records: An SMS/800 system change was required when Guam was added to the North American numbering plan to allow toll-free calls to be placed from there. This issue was discussed at the SNAC.
3. Resp Org information downloaded to SCPs: See previous discussion.
4. Reports database: Again this was discussed earlier. The implication that there was an "industry process" that covers all of the SMS/800 activities is not accurate. The SNAC prioritization process addresses SNAC identified issues only. The Bell companies have consistently reminded the SNAC of their need to deal with requirements from other groups as well (*e.g.*: SCP requests, requests from the vendors supporting SMS/800, FCC mandates, evolution of the system, items uncovered as part of the user surveys or task force investigations). The Bell companies have committed to keeping the SNAC members informed of changes being made in the system, but RHDB and GUI were not "outside" of any industry process.